



South Coast Air Quality Management District

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SENT VIA E-MAIL AND ONLINE:

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<https://cara.ecosystem-management.org/Public/CommentInput?Project=58467>

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Draft Environmental Assessment (EA) for Proposed North Big Bear Landscape Restoration Project #58467 (Proposed Action)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. United States Department of Agriculture (USDA) Forest Service – San Bernardino National Forest is the National Environmental Policy Act (NEPA) Lead Agency for the Proposed Action. The following comments include a discussion of specific requirements of South Coast AQMD Rule 444 – Open Burning that should be included in the Final EA.

South Coast AQMD Staff's Summary of the Proposed Action

Based on the Draft EA, the Proposed Action consists of implementation of landscape restoration actions to enhance recreation on multi-use trails, promote sustainable and effective recreation management, reduce the threat of catastrophic wildfire events, and increase forest health and diversity. The Proposed Action encompasses approximately 13,000 acres of forested area north of Big Bear Lake within the San Bernardino National Forest. Implementation of landscape restoration actions are assumed to take place 10 days out of a year and would include the use of off-road equipment, light-duty trucks and fire apparatuses, a helicopter, and prescribed, open burning activities. Some hand thinning may also occur to assist in reducing the fuel load from forested areas. Prescribed fire activities are anticipated to occur between the months of November through June and would be expected to occur at an intermittent frequency based upon monitored fuel load conditions.

South Coast AQMD Staff's Summary of the Air Quality Analysis

Based on the Draft EA, the NEPA Lead Agency quantified the Proposed Action's annual emissions and compared those emissions to the General Conformity *de minimis* emissions thresholds. Based on this analysis, the NEPA Lead Agency found that the Proposed Action would exceed the *de minimis* thresholds for NO_x, VOC, and CO emissions. However, the NEPA Lead Agency explained that the bulk of emissions, which are anticipated to come from prescribed fire burning activities, have already been accounted for in the State's Implementation Plan. Therefore, the emissions from the Proposed Action would not cause or contribute to new violations of federal ambient air quality standards, exacerbate existing violations, or interfere with timely attainment or required interim emission reductions towards attainment.

South Coast AQMD Staff's Comments: South Coast AQMD Rule 444 – Open Burning

The Draft EA included a discussion of general compliance with South Coast AQMD Rule 444¹. The NEPA Lead Agency should ensure that the Proposed Action will comply with specific requirements of South Coast AQMD Rule 444 – Open Burning² for prescribed burning activities, which includes the preparation of a Smoke Management Plan for any project that is greater than 10 acres or that would produce more than one ton of particulate matter emissions. Smoke Management Plans must be approved by South Coast AQMD prior to commencing open burning and are required to contain specific information about the burn location, material being burned, and the expected burn duration, among other information. South Coast AQMD staff recommends that the NEPA Lead Agency include a discussion of the specific requirements of South Coast AQMD Rule 444 regarding a Smoke Management Plan in the Air Quality Section of the Final EA.

South Coast AQMD staff is available to work with the NEPA Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/DB/DH/SE:AM/kb
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¹ Draft EA. Page 45.

² South Coast AQMD Rule 444 – Open Burning. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-444.pdf>.